

Message

From: Perlis, Robert [Perlis.Robert@epa.gov]
Sent: 12/17/2019 4:55:38 PM
To: Garrison, Scott [Garrison.Scott@epa.gov]
Subject: RE: Administrator Memo - Pending Dicamba 24c & NY 24c
Attachments: Administrator Memo 24(c) Dec 2019 (clean).sbg.bp.docx

Scott:

Here are my quick comments on the 24c paper. I'd like to discuss them with you before sending to OPP. I've got a 1:00 (until 2:00) with Jim Payne. Any particular time good for you?

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(202) 564-5636

From: Garrison, Scott <Garrison.Scott@epa.gov>
Sent: Tuesday, December 17, 2019 10:47 AM
To: Perlis, Robert <Perlis.Robert@epa.gov>; Cole, Joseph E. <cole.josephe@epa.gov>
Subject: FW: Administrator Memo - Pending Dicamba 24c & NY 24c

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My comments attached. I'll wait to hear from you before responding to Mike.

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From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Monday, December 16, 2019 5:10 PM
To: Garrison, Scott <Garrison.Scott@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Chiu, Enid <Chiu.Enid@epa.gov>
Subject: Administrator Memo - Pending Dicamba 24c & NY 24c

Scott

Attached for your review/comment is a draft memo to the Administrator regarding disapproval of 24c registrations that are more restrictive than the sect 3.

Included are both a marked-up and clean version of the document. In addition to your overall review, we ask for your input on whether or not a state can amend an existing 24c and are they subject to disapproval within the 90-day window.

Also, some states include provisions in their 24c for training requirements, for example – would these be considered more restrictive and subject to disapproval?

We received direction that they would like this memo to be provided to the Administrator by COB Wednesday. I expect the OCSPP IO will have comments too, so your review as practicable is appreciated.

Michael L. Goodis, P.E.
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